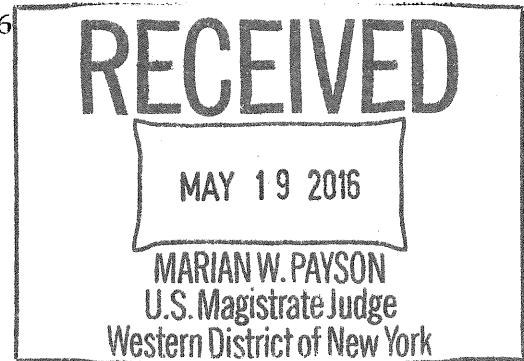


**Thomas & Solomon LLP**  
THE EMPLOYMENT ATTORNEYS

May 19, 2016

VIA FACSIMILE AND U.S. MAIL

Honorable Marian W. Payson  
United States District Court  
Western District of New York  
100 State Street  
Rochester, New York 14612



Re: Hicks, et al, v. T.L. Cannon Management Corp., et al.  
Civil Action No. 13-cv-6455

Dear Judge Payson:

I write to submit plaintiffs' proposed scheduling order. The parties have conferred in good faith and have agreed on a number of issues, but are unable to agree on the dates for the discovery schedule and motions deadline going forward. We are therefore submitting our proposal, and expect that the defendants will submit their proposal separately.

We are available to discuss at the court's convenience.

Respectfully submitted,

*Jared K. Cook / RDH*

Jared K. Cook

Having reviewed both parties' proposed submissions, the Court sets the following extended deadlines:

- (1) plaintiffs' report on damages – 6/10/16;
- (2) defendants' report on damages (rebuttal) – 7/8/16;
- (3) completion of expert depositions – 8/8/16;
- (4) supplemental reports – 8/22/16;
- (5) dispositive motions deadline – 9/19/16.

The parties shall execute the remainder of their stipulation and submit it to Judge Wolford for review and approval.

**SO ORDERED.**

Dated: 5/23/16

*Marian W. Payson*

Marian W. Payson  
U.S. Magistrate Judge

cc: Jessica F. Pizzutelli, Esq. (via e-mail)  
Craig Benson, Esq. (via e-mail)